DECLARATION OF ANIQUE WHITMORE

- 1. My name is Anique Whitmore. I am more than twenty-one years of age, competent to testify, and have no legal or mental disability. I freely give this declaration for use in *A.J. & Q.C. v. MASP, LLC*, No. 1:23-cv-4247-JPB (N.D. Ga. 2023). This declaration was executed in the state of Arizona, where I am currently located.
- 2. I am a licensed psychotherapist with over twenty-one years of experience specializing in evaluating victims of sexual abuse, exploitation, and trafficking. I submit this declaration based on my personal and specialized knowledge, training, and experience.
- 3. Throughout my career, I have held various roles relevant to my expertise, as outlined in my report. My work in these positions involved direct engagement with victims of sexual abuse, exploitation, and trafficking.
- 4. I maintain a private practice that provides therapy and consultation services for cases involving sexual abuse, exploitation, and trafficking.
- 5. In my work as a psychotherapist, I engage with clients by conducting interviews or assessments, formulating a therapeutic plan, and implementing that plan throughout our session.

- 6. Since 2003, I have focused at least some of my practice on serving victims of sex trafficking. I estimate that up to twenty percent of my clients in private practice are victims of sex trafficking.
- 7. Since 2001, I have pursued specialized education and training on sex trafficking through courses provided by the Georgia Bureau of Investigation, the Federal Bureau of Investigation, and the National Center for Missing and Exploited Children in Washington, D.C. In addition to my role as a student, I also serve as an instructor for law enforcement, district attorney's offices, Child First, and the Trial Counsel Assistance Program (TCAP), a training program offered by The United States Army Judge Advocate General's (JAG) Corps., educating them on various aspects of human trafficking and its impact on victims.
- 8. I regularly provide both therapeutic and consultative services for trafficking cases. I have testified in hundreds of cases across 32 jurisdictions in more than 14 states and 3 countries on topics related to sexual abuse, exploitation, and sex trafficking. Roughly 45 of those cases have been related solely to sex trafficking.
- 9. Most recently, I testified in *W.K.*, *et al. v. Red Roof Inns, Inc. et al.*, No. 1:20-cv-05263-VMC (N.D. Ga. 2020), a case brought by eleven sex-

- trafficking victims against various hotels in the Atlanta area under the Federal Trafficking Victims Protection Reauthorization Act (TVPRA).
- 10. My expertise has been sought by people conducting peer-reviewed research on the topic of trafficking.
- 11. Over my twenty-one years of experience, I have extensively studied traffickers and gained insights into their dynamics, personalities, methods, and their access to victims.
- 12. Under 28 U.S.C. § 1746, I declare under penalty of perjury that this Declaration comprising 12 numbered paragraphs is true and correct. Executed on October 25, 2024.

Anique Whitmore